

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



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Application of San Diego Gas & Electric Company  
(U 902 E) to Review Green Access Programs Pursuant  
to Decisions 18-06-027 and 21-12-036.

Application 22-05-\_\_\_\_  
(Filed, May 31, 2022)

**APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E)  
TO REVIEW GREEN ACCESS PROGRAMS PURSUANT TO  
DECISIONS 18-06-027 AND 21-12-036**

**REQUEST FOR EXPEDITED SCHEDULE – RULE 2.9**

E. Gregory Barnes  
8330 Century Park Court, CP32D  
San Diego, California 92123  
Telephone: (858) 654-1583  
Facsimile: (619) 699-5027  
Email: [gbarnes@sdge.com](mailto:gbarnes@sdge.com)

Attorney for:  
SAN DIEGO GAS & ELECTRIC COMPANY

May 31, 2022

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Pursuant to Article 2 of the Commission’s Rules,<sup>1</sup> and Commission Decisions (“D.”) 18-06-027 and D.21-12-036, San Diego Gas & Electric Company (“SDG&E”) submits this application addressing SDG&E’s Green Access Programs (“GAP”). Specifically, D.18-06-027 requires this application to review two programs, the Disadvantaged Communities Green Tariff (“DAC-GT”) program and the Community Solar Green Tariff (“CSGT”) program.<sup>2</sup> D.21-12-036, OP 11 at 55-56, added to the scope of this application by requiring that it “... shall include implementation details of [the utilities’] Green Tariff Shared Renewables [GTSR] Programs in their 2022 ... [DAC-GT and CSGT] Applications for Review.” The GTSR

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<sup>1</sup> Citations herein to a “Rule” or “Rules” are to the Commission’s Rules of Practice and Procedure.

<sup>2</sup> D.18-06-027, Ordering Paragraph (“OP”) 16 at 104, requires that the investor-owned utilities (“IOUs”) each file an application for review of the subject programs no later than January 1, 2021, and that the resulting proceeding would include a review of both the programs’ costs and benefits, and may result in revisions to the tariff, if appropriate. In December 2020, the Commission’s Executive Director approved a one-year extension request, until January 1, 2022, for the IOUs to submit complying applications. SDG&E, Pacific Gas and Electric Company (“PG&E”) and Southern California Edison Company (“SCE”) requested a further extension of time to allow the IOUs time to include and respond in their applications to the analysis and recommendations of the then-pending statewide independent evaluation (“IE”) of the DAC-GT and CSGT programs directed by D.18-06-027. By letter dated October 28, 2021, the Executive Director approved the further extension to 60 days after service of the final IE report. The final IE report was served April 1, 2022.

programs were instituted pursuant to Senate Bill (“SB”) 43<sup>3</sup> and D.15-01-051 (“GTSR decision”). This application is submitted in compliance with the foregoing decisions.

Pursuant to Commission Rule 2.9, this application includes a request for expedited consideration for the portion of this application concerning suspension of SDG&E’s GTSR program.<sup>4</sup>

In addition, this application and supporting testimony are informed by the guidance document issued by the Commission’s Energy Division staff.<sup>5</sup>

## **I. INTRODUCTION AND SUMMARY OF AUTHORIZATION SOUGHT**

This application and supporting prepared testimony describe the history, implementation, results, and new proposals regarding SDG&E’s GAP.<sup>6</sup> With respect to the DAC-GT and CSGT program, SDG&E has operated the DAC-GT and CSGT programs pursuant to D.18-06-027, D.18-10-007, and Resolution E-4999 (May 30, 2019). D.18-06-027 first approved the mandatory administration of DAC-GT and CSGT for IOUs, as well as the optional administration of these programs for Community Choice Aggregators (“CCAs”). This decision requires this application to review and report on the program activity to date and request

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<sup>3</sup> SB 43, Stats. 2013-2014, Ch. 413 (Cal. 2013).

<sup>4</sup> Per Rule 2.9(b), to support the request for expedited consideration, this application includes “an attachment, not exceeding 3 pages, titled ‘Request for Expedited Schedule.’”

<sup>5</sup> Commission Energy Division, *Guidance Document for the Disadvantaged Communities Green Tariff (DAC-GT) and community Solar Green Tariff (CSGT) Program 2022 Applications for Review* (September 2021) (“guidance document”). SDG&E appreciates the efforts of Energy Division staff to rationalize treatment of the disparate programs in the application through the guidance document and workshops. The guidance document is available at <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/solar-in-disadvantaged-communities/2022-gap-applications-guidance-template.pdf>.

<sup>6</sup> This application adopts the useful acronym in the Energy Division’s guidance document, which includes the following programs that provide the disadvantaged access to renewable energy: Disadvantaged Communities-Green Tariff; Community Solar Green Tariff (both resulting from R.14-07-002), and Green Tariff Shared Renewables (approved in A.12-01-008, *et al.*).

modifications to the DAC-GT and CSGT programs,<sup>7</sup> and specifically requires of this application, “[t]hat the proceeding will include a review of both the programs’ costs and benefits, and may result in revisions to the tariff, if appropriate.”<sup>8</sup>

D.21-12-036, OP 11 at 55-56, added to the scope of this application by requiring that it “... shall include implementation details of their ... [GTSR] Programs” in this application. Finally, this application provides information in response to direction in the Commission Energy Division’s disposition letter<sup>9</sup> concerning SDG&E’s *Request to Suspend* its GTSR programs in Advice Letter (“AL”) 3920-E (submitted December 17, 2021).

This application requests the following authorizations and Commission direction regarding SDG&E’s GAP:

**Disadvantaged Communities and Community Solar Green Tariffs**

- **Authorization to terminate SDG&E’s allocated megawatts (“MW”) portion of CSGT and DAC-GT programs<sup>10</sup>** due to their unviability as a result of the limited number of disadvantaged communities (“DACs”) in SDG&E’s service territory coupled with tremendous load departure due to the vast majority of customers recently choosing commodity service from CCAs.

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<sup>7</sup> D.18-06-027, OP 16 at 104.

<sup>8</sup> *Id.*

<sup>9</sup> Peter Skala, Interim Director, Energy Division, to Clay Faber, Director, Regulatory Affairs, *Staff Disposition of San Diego Gas & Electric Company’s Advice Letter Request to Suspend EcoChoice and EcoShare Rates (Schedule GT and Schedule ECR)* (April 19, 2022).

<sup>10</sup> While the CSGT, DAC-GT and GTSR efforts are known as “programs,” there are also rates components within each of these programs, and each is a commodity rate or credit appearing on a customer’s bill. This is necessary to understand because there are references to both programs and rates throughout this document, depending on whether the reference is to the program (enrollment, marketing, solicitations, and the like), versus rate elements such as the commodity costs.

- **Authorization to continue to transfer appropriate MWs to CCAs who seek Commission approval for the allocations for their own CSGT and DAC-GT programs.** SDG&E requests authorization to continue to track and use electric cap and trade auction proceeds and Public Purpose Program (“PPP”) funds for these programs, including the CCA portions, and to continue to record transferring of funds to CCAs approved to offer the programs; and SDG&E requests to continue to file budget advice letters each year on February 1 for all direct, discreet IOU costs related to the support of the program, including evaluation through the Energy Resource Recovery Account (“ERRA”) proceeding. SDG&E requests to continue to file budget advice letters each year on February 1 for all direct, discreet IOU costs related to the support of the program including evaluation.

#### **Green Tariff Shared Renewables**

- **Authorization to suspend SDG&E’s GTSR programs to protect program participants from impacts to GTSR rates that are on a trajectory to be more than 20 times higher** than the rates were two years ago which cannot be overcome through program design changes. As part of this authorization, SDG&E further requests the Commission:
  - Direct SDG&E to seek cost recovery of its GTSR balancing account under collection to date for those costs that have been reviewed through the ERRA Compliance Proceedings and going forward as costs are reviewed in the future Annual ERRA Compliance Proceedings.

- As SDG&E is required to offer the programs to all customers, authorize SDG&E to seek recovery of SDG&E's reviewed under collection, and future GTSR program costs, once reviewed, in future Annual ERRA Compliance Proceedings.

The authorization to suspend the GTSR program is the subject of the Request for Expedited Schedule discussed in the Rule 2.9 attachment to this application. Per Rule 2.9(c), “[t]he assigned Commissioner has the discretion to grant a request for an expedited schedule if the attachment demonstrates specific facts, that constitute either: a threat to public safety or the need to resolve a financial matter expeditiously to avoid ratepayer harm.” The Rule 2.9 attachment demonstrates that an expedited schedule on a separate track is required for this one issue to avoid ratepayer harm here.

## **II. CONTENTS OF THIS APPLICATION**

In addition to complying with Article 2 of the Commission's Rules, and the decisions recited above, this application is structured to conform to and address: (i) the Commission Energy Division's guidance document<sup>11</sup> for the IOUs regarding applications pursuant to the subject decisions; and (ii) the directions in Energy Division's disposition letter<sup>12</sup> responding to SDG&E's Request to Suspend its GTSR programs in AL 3920-E (submitted December 17, 2021). The Commission's authority and relief requested by this application as required by Rule 2.1 is summarized in the previous section.

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<sup>11</sup> See n.5, *supra*.

<sup>12</sup> From Peter Skala, Interim Director, Energy Division, to Clay Faber, Director, Regulatory Affairs, *Staff Disposition of San Diego Gas & Electric Company's Advice Letter Request to Suspend EcoChoice and EcoShare Rates (Schedule GT and Schedule ECR)* (April 19, 2022).

This application is supported by prepared direct testimony<sup>13</sup> organized in consideration of the Energy Division guidance document. Pursuant to Rule 1.7, this testimony is not being filed with this application, but will be concurrently served on the appropriate service lists.<sup>14</sup> SDG&E incorporates this testimony into this application by reference. The testimony is sponsored by the following witnesses:

- Hollie K. Bierman - Program Design and Policy
- Randall Nicholson – Procurement
- Eric Dalton – Regulatory Accounts and Path To Cost Recovery

Pursuant to the guidance document, the testimony is presented as a single document with a table of contents reflecting the Energy Division’s guidance. The portion of the testimony sponsored by each witness is identified in the table of contents, and qualifications for each witness are also included with the testimony.

This application follows with a brief description of the programs’ design and why SDG&E seeks the authorization in the application, and it concludes with the information required by statute and the Commission’s Rules.

### **III. SUMMARY DESCRIPTION OF PROGRAMS AND PROPOSALS SUBMITTED FOR APPROVAL**

The information that follows summarizes material in the testimony supporting the application; the testimony is supported by knowledgeable witnesses and citation to authority.

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<sup>13</sup> References to “testimony” herein are to the prepared direct testimony served in support of this application.

<sup>14</sup> In addition to serving the chief administrative law judge, this application and supporting testimony will be filed on the service lists for A.12-01-008, *et al.*, and R.14-07-002, *et al.*



## **A. DAC-GT Summary**

D.18-06-027 authorized SDG&E to procure, through a competitive solicitation process, up to 18 MW nameplate capacity of eligible solar generation to serve customers participating in the DAC-GT program in SDG&E's territory.<sup>15</sup> Once eligible program generation is available for use, eligible customers can be enrolled in the program, whereby 100% of their electric usage would be credited towards the dedicated solar generation. One goal of the DAC-GT program is to incentivize the development of renewable energy options within DACs, and thus DAC-GT generation facilities must be located in an eligible DAC.<sup>16</sup> To incentivize the development of renewable generation in DACs, the decision set a cost containment mechanism, which requires IOUs to execute a Power Purchase Agreement ("PPA") with any conforming bid up to the clearing price cap up to "200 percent of the maximum executed contract price in either the Renewable Auction Mechanism's ("RAM") as-available peaking category or the Green Tariff program."<sup>17</sup>

Similar to the incentive of higher-than-market prices for solar developers, DAC-GT provides a line item 20% discount on participating customers' electric bills. The customer bill discount is applied to the customer's current electric rate, meaning that once a customer opts into the DAC-GT program, they will experience a net 20% discount from their underlying rate. SDG&E's DAC-GT program is available only to bundled residential electric customers located in a DAC, as defined by the program guidelines, who meet California Alternate Rates for Energy

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<sup>15</sup> D.18-06-027 at 18, 53, 64. Resolution E-4999 (May 30, 2019), OP 8 at 69, clarified that IOUs are required to hold two DAC-GT solicitations per year providing an opportunity for solar project developers to submit proposals for DAC-GT dedicated projects.

<sup>16</sup> D.18-06-027 at 56.

<sup>17</sup> *Id.* at 84.

(“CARE”) or Family Electric Rate Assistance (“FERA”) eligibility criteria. Details can be found in SDG&E’s tariff for the program, Schedule DAC-GT.<sup>18</sup>

SDG&E does not have any enrolled customers in DAC-GT because SDG&E has been unable to secure contracts for qualifying renewable power located in DACs. For this reason, this application seeks authorization to terminate SDG&E’s allocated MW portion of CSGT and DAC-GT programs due to their unviability as a result of the limited number of DACs in SDG&E’s service territory coupled with tremendous load departure due to the vast majority of customers recently transitioning to commodity service from CCAs.

## **B. CSGT Summary**

SDG&E’s CSGT program is authorized to procure up to five MW of total nameplate capacity of eligible solar generation to serve eligible CSGT customers. Like DAC-GT, SDG&E must administer two solicitations each year for eligible CSGT projects, and the same cost containment mechanism is applied. Eligible CSGT solar generation facilities must also be sited in a DAC. However, a primary distinction of the CSGT program (and a tighter constraint) is that eligible customers must also be located in a DAC within five miles of the generation facility. CSGT also provides eligible electric customers the opportunity to subscribe to the dedicated renewable generation for 100% of their electric usage and applies a 20% bill discount on participants electric bill to guarantee an economic benefit from participating.

Once a dedicated CSGT generation is contracted and online, the program is made available first to residential customers in a DAC located within five miles of the project site who meet the eligibility criteria of CARE or FERA. Once at least 50% of the project’s capacity has

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<sup>18</sup> SDG&E’s DAC-GT and CSGT tariffs were originally filed in AL 3262-E and 3262-E-A in accordance with D.18-06-027 and revised in AL 3262-E-B and AL 3262-E-D, (approved May 13, 2020, and effective December 13, 2019).

been allocated to low-income customers, the remaining program capacity is made available to the project's Community Sponsor (up to 25%) and non-low-income residential customers that meet the locational criteria.<sup>19</sup> Each CSGT project is required to have at least one Community Sponsor, which is a community-based organization or local government that can facilitate community engagement with the project. Community Sponsors are also eligible to receive the 20% bill discount on portion of the projects generation capacity for which they are enrolled (limited to 25%). Details can be found in SDG&E's tariff for CSGT, Schedule CSGT.<sup>20</sup>

If a CCA or an Electric Service Provider ("ESP") offers a Commission-approved CSGT program, those enrolled in the CCA's or ESP's program will be eligible to receive the 20% discount on the SDG&E-portion of their bill (*i.e.*, the Utility Distribution Company ("UDC") charges). CCA customers cannot directly enroll in SDG&E's program.

SDG&E does not have any enrolled customers in CSGT because SDG&E has no contracts for qualifying renewable power located in DACs. As with DAC-GT, this application seeks authorization to terminate SDG&E's allocated MW portion of CSGT and DAC-GT programs due to their unviability as a result of the limited number of DACs in SDG&E's service territory coupled with tremendous load departure due to the vast majority of customers recently choosing commodity service from CCAs.

### **C. GTSR Summary**

D.15-01-051 granted, with modifications, SDG&E's request in A.12-01-008 to implement SB 43,<sup>21</sup> which required large California electric utilities to implement the GTSR

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<sup>19</sup> D.18-06-027 at 79-80.

<sup>20</sup> SDG&E, Schedule CSGT, available at [https://tariff.sdge.com/tm2/pdf/ELEC\\_ELEC-SCHEDS\\_CSGT.pdf](https://tariff.sdge.com/tm2/pdf/ELEC_ELEC-SCHEDS_CSGT.pdf).

<sup>21</sup> SB 43, Stats. 2013-2014, Ch. 413 (Cal. 2013), *codified at* P.U. Code §§ 2831 *et seq.*

program. SDG&E's approved GTSR program includes both: (i) a Green Tariff option (Schedule GT, offered under the brand EcoChoice), which allows bundled customers to increase the amount of renewable energy provided by SDG&E; and (ii) an Enhanced Community Renewables component ("ECR") (Schedule ECR, branded by SDG&E as EcoShare), which allows bundled customers to purchase renewable energy directly from third-party renewable developers. After approval of several implementing advice letters,<sup>22</sup> SDG&E offered GTSR to customers starting in late 2016.

For some years, service on EcoChoice resulted in a bill credit or added little additional cost to a participant customer's bill. However, due to the recent proliferation of CCA service in SDG&E's service territory and the resulting loss of enrollment in EcoChoice (as an SDG&E commodity rate), the EcoChoice rate is now exponentially more expensive than SDG&E's standard retail rate offerings. As a result, SDG&E has seen drastic attrition of SDG&E's remaining bundled EcoChoice participants, stranding costs to run the program with far fewer customers who remain on the tariff to bear the program costs.

The GTSR decision sets a 20 MW target for EcoShare, and requires SDG&E to reserve half (10 MW) of its ECR program target for projects sized between 500 kilowatts ("kW") and one MW located in areas previously identified by the California Environmental Protection Agency as the most impacted and disadvantaged communities (the Environmental Justice or EJ Reservation).<sup>23</sup> The other half of the target may be met by ECR projects between 500 kW and 20 MW, and located in SDG&E's service territory or the adjacent Imperial Valley. To date, no

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<sup>22</sup> Resolution E-4734 (October 1, 2015) approved SDG&E's Advice Letters 2743-E/E-A, 2744-E/E-A and 2745-E/E-A/E-B to implement its GTSR program. AL 3168-E in 2017 requested minor modifications to the GTSR tariff along with provisions to extend the tariff availability through 2023 (approved, Resolution E-5028 (September 26, 2019)).

<sup>23</sup> D.16-05-006 at 12.

developers have currently executed PPAs with SDG&E to support EcoShare, and since no such facilities have interconnected, there have been no EcoShare enrollees.

**D. The recent and dominant role of CCA, plus the compact nature of SDG&E's service area, drives the relief sought here**

All three of SDG&E's current programs subject to this application are commodity offerings to bundled customers. When the decisions were issued that established these programs, nearly all of SDG&E's electric service was bundled, save for only a small portion of direct access ("DA"). The recent explosion of customers leaving for CCA commodity service means that the fixed program costs, and the cost of procuring renewable generation dedicated to the programs, must be spread over a small and shrinking number of customers, orders of magnitude lower than the customer base anticipated when the programs were designed and approved.

SDG&E had no CCA customers until recently. SDG&E's first CCA customer departures were a very small number (about 8,000) in June 2018. More recently, SDG&E's CCA departures have exploded. The most prominent example is the CCA implementation for San Diego Community Power ("SDCP") whose first three phases of enrollment account for 40% of SDG&E's bundled customer load, to be completed by June 2022. SDG&E anticipates that approximately 65% of its bundled customer load will have departed bundled service by the end of 2022, this includes customers who are enrolled with the other CCA, Clean Energy Alliance ("CEA") as well as customers who are Direct Access. Those customers are no longer eligible to participate in GTSR. Other local governments have declared their intent to depart bundled service, joining with either SDCP or CEA beginning in 2023, further increasing the share of departed customer load to more than 80%. Other jurisdictions could follow. This scenario was

not anticipated at the time of SDG&E's first GAP application (for GTSR) in 2012, and it appears unique to SDG&E.<sup>24</sup>

In section E. below, SDG&E details the ratepayer harm arising from these recent CCA departures, and why the Commission can and should immediately suspend SDG&E's GTSR program under Rule 2.9.

In addition to the recent bundled load departure, DAC-GT and CSGT have requirements specific to Disadvantaged Communities; the programs' design in this regard does not work well in SDG&E's service area. Customer enrollment and program activity have been limited by the programs' design. The programs are available, *contingent upon the availability of electricity generated from program-specific renewable generation facilities*.<sup>25</sup> SDG&E cannot enroll participants into the DAC-GT or CSGT programs unless a qualifying generation facility has been contracted, developed and granted permission to operate through interconnection with the grid via SDG&E's Electric Rule 21 (Generating Facility Interconnections). Because SDG&E has been unable to secure contracts for such generating facilities, SDG&E has not enrolled any customers.

SDG&E has not received any bids for solar facilities in local DACs principally because DAC-GT and CSGT generation facilities must be physically located in or near DACs, using the top 25% DAC definition, which in SDG&E's territory does not contain sites suited for utility-scale solar generation installations; most eligible DACs in SDG&E's territory are in densely

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<sup>24</sup> In contrast, most of PG&E's CCA departures took place before GTSR implementation, and the proportion of customers choosing CCA service for PG&E and SCE is much smaller than that of SDG&E, along with both utilities' substantially larger number of customers.

<sup>25</sup> SDG&E's Schedule DAC-GT and Schedule CSGT, Program Availability section, Sheet 3, available at [https://tariff.sdge.com/tm2/ssi/inc\\_elec\\_rates\\_res.html](https://tariff.sdge.com/tm2/ssi/inc_elec_rates_res.html).

populated urban and coastal areas.<sup>26</sup> SDG&E seeks to terminate its MW program allocation in this proceeding because program design changes are unlikely to yield a successful program. For example, even if the DAC definition is broadened to the top 50% of most disadvantaged census tracts statewide, the DACs would still largely lie in urban and coastal areas in SDG&E's territory and face the same siting limits, so this would not resolve the prohibitive siting challenges in SDG&E's service area.

**E. Expedited consideration of "rapid suspension" is appropriate**

SDG&E requests an expedited schedule for one discrete and severable issue within the scope of this application. That issue concerns the suspension of SDG&E's GTSR program, and it does not affect the remainder of this application, which may be resolved on the conventional Rule 2.1 schedule proposed herein.<sup>27</sup> Per Rule 2.9(c), the assigned Commissioner may "grant a request for an expedited schedule if the attachment demonstrates specific facts, that constitute ... the need to resolve a financial matter expeditiously to avoid ratepayer harm." In sum, an expedited schedule to immediately suspend SDG&E's GTSR program is required to avoid ratepayer harm here, because statutorily mandated program design and the recent CCA load departures described above have combined to inflict large and unsustainable rate increases on GTSR program participants.

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<sup>26</sup> Unlike the sprawling and geographically diverse PG&E and SCE service territories, SDG&E serves two adjacent coastal counties, with the population - and the DACs - packed near the coast, where opportunities to site generation are scarce and expensive. And the marine layer typical of coastal weather prevents an optimal solar generation load factor. SDG&E's territory has no analogue to, for example, the Central Valley, that contains both DACs and rural siting opportunities.

<sup>27</sup> If the request for expedited schedule is granted, SDG&E expects the bulk of its application will be consolidated with those of the other IOUs, with a separate schedule for the consolidated applications set accordingly. SDG&E attaches hereto the Rule 2.9(b) attachment the rule requires. Because Rule 2.9(b) limits this attachment to three pages, this attachment is necessarily a summary, and SDG&E requests that the Commission consider the information in this section and the rest of the application in deciding the disposition of the request for expedited schedule.

**Ratepayer harm:** Because GTSR is a commodity offering, the recent SDG&E customer exodus for CCA commodity service means that fixed program costs, and the cost of procuring renewable generation dedicated to the programs, must be spread over a small and shrinking number of customers, orders of magnitude fewer than the customer base anticipated when the programs were designed and approved in 2015. The resulting participant rate impact is enormous. In 2016, the residential GTSR rate was about \$0.001 per kWh. In 2021 it soared above five cents per kWh, and in 2022 it is over 24 cents per kWh.<sup>28</sup>

**Attempts to mitigate ratepayer harm:** To mitigate the ratepayer harm, SDG&E: (i) filed AL 3920-E (December 17, 2021) requesting approval to suspend its GTSR programs, and (ii) launched an aggressive campaign in fall 2021 to inform customers of the coming rate increase. Energy Division denied AL 3920-E (letter dated April 19, 2022) stating that SDG&E should provide a detailed mitigation and suspension plan in this application. The marketing campaign has had some success; only about .75 MW remain subscribed from about 390 customer accounts remain on GTSR at time of filing, down from 51.2 MW in January 2021. The 2023 estimated average monthly GTSR rate (based on fewer customers forecast than today) is \$1.40 per kWh.<sup>29</sup> That means an average residential GTSR customer with a monthly demand of around 400 kWh that does not heed the customer education efforts will incur *a more than \$460 charge on top of their otherwise applicable rate.*

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<sup>28</sup> This situation appears unique to SDG&E. Most of PG&E's CCA departures took place before GTSR implementation, and the proportion of customers choosing CCA service for PG&E and SCE is much smaller than that for SDG&E, with program costs spread over both utilities' substantially larger customer base.

<sup>29</sup> This amount is estimated and includes the Power Charge Indifference Adjustment with the Renewable Generation Rate, or RGR.



**The Commission can suspend the program now:** By statute, SDG&E must offer GTSR to *all* customers. D.15-01-051 (at 83) found that “under certain unique circumstances, such as risk of ratepayer exposure to excessive costs due to ... market malfunction, it may be necessary to authorize a rapid suspension of the GTSR Program.” SB 840 amended the GTSR statute in 2016 to remove the program sunset date. While finding that amendment barred absolute termination of a utility GTSR program, D.19-05-031 confirmed that suspension remains an available remedy in appropriate circumstances.<sup>30</sup> This decision (at 11) observed that the “intent” of this passage in D.15-01-051 “requires utilities to set forth proposals to resolve the issue before granting a suspension.” But D.19-05-031 did not dispute that the public interest might require immediate (“rapid”) suspension. Nor did it imply that a fully baked resolution must be submitted, but only that a path forward is identified, which SDG&E submits with this application and supporting testimony.<sup>31</sup> D.19-05-031 confirms that the Commission can immediately suspend SDG&E’s GTSR program on an expedited schedule and address future GTSR program design on the Rule 2.1 procedural course in this proceeding.

Moreover, the requested relief – suspension – does not require evidentiary hearings - indeed, it could be granted here on an *ex parte* basis, *i.e.*, by Commission staff, without Commission approval. D.15-01-051 (OP 14 at 183) provides that GTSR can be suspended by staff action – by a Tier 2 advice letter. While the Energy Division denied SDG&E’s request to suspend in AL-3920-E, no party objected to the suspension request. Only one party responded to the AL, San Diego Community Power (“SDCP”), who did not object to the suspension request as

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<sup>30</sup> *Id.* at 10-11 and Conclusion of Law 6 at 15 (“there is a distinction between ‘suspension’ and ‘termination’”).

<sup>31</sup> The staff denial of AL 3920-E is wrong that “Without ... [supplying an end date for suspension] ... [the AL] is in effect an early termination request.” The Commission is not bound by this staff interpretation, which has no basis in the Commission precedent.

such, but expressed concern about the treatment of program costs going forward.<sup>32</sup> SDG&E proposes a treatment for program costs in this application and supporting testimony, which SDG&E expects will be adjudicated in the Rule 2.1 schedule for the application set by the scoping memo (save for the expedited schedule for suspension, if granted). In sum, interested parties have already had the opportunity to object to SDG&E's suspension request in the context of AL 3920-E, and none have done so. The expedited schedule requested herein for suspension will not prejudice the adjudication of SDCP's concern within the Rule 2.1 schedule, and thus the expedited schedule and GTSR suspension should be granted.

**Relief requested:** A ruling authorizing SDG&E to submit a Tier 1 AL to undertake the following near-term mitigation: (1) to close GTSR to new participants effective immediately; (2) to continue to cease soliciting PPAs for GTSR during the suspension; (3) to inform existing EcoChoice customers about the approval of the advice letter and the suspension, and to quickly disenroll customers from GTSR who will remain on their otherwise applicable rate; (4) to update SDG&E's GTSR website to add current suspension status and further educate customers who may seek information on the rates; and (5) to ramp down administrative program support of GTSR, excluding minimal reporting.

Please see the Rule 2.9 attachment "Request for Expedited Schedule" to this application for more information.

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<sup>32</sup> Samir Hafez, Attorney for SDCP, to Ed Randolph, Director, Energy Division, *San Diego Community Power's Response to San Diego Gas & Electric Company's Tier 2 Advice Letter 3920-E Request to Suspend EcoChoice and EcoShare Rates (Schedule GT and Schedule ECR)* (January 6, 2022) at 2.

#### **IV. STATUTORY AND PROCEDURAL REQUIREMENTS**

##### **A. Rule 2.1(a)—(c)**

In accordance with Rule 2.1(a)-(c), SDG&E provides the following information:

##### **1. Rule 2.1(a) – Legal Name**

SDG&E is a corporation organized and existing under the laws of the State of California. SDG&E is engaged in the business of providing electric service in a portion of Orange County and electric and gas service in San Diego County. The exact legal name of the Applicant is San Diego Gas & Electric Company. SDG&E's principal place of business is 8330 Century Park Court, San Diego, California 92123. SDG&E's attorney in this matter is E. Gregory Barnes.

##### **2. Rule 2.1(b) – Correspondence**

Correspondence or communications regarding this Application should be addressed to:

Michelle Somerville  
Regulatory Case Manager  
San Diego Gas & Electric Company  
8330 Century Park Court, CP32D  
San Diego, California 92123  
Telephone: 858-654-6356  
Email: msomerville@sdge.com

With copies to:

E. Gregory Barnes  
Attorney for:  
San Diego Gas & Electric Company  
8330 Century Park Court, CP32D  
San Diego, California 92123  
Telephone: (858) 654-1583  
Facsimile: (619) 699-5027  
Email: gbarnes@semprautilities.com

**3. Rule 2.1(c)**

**a. Proposed Category of Proceeding**

In accordance with Rule 7.1, SDG&E requests that this application be categorized as ratesetting because SDG&E proposes to recover the costs described in this application from its ratepayers.

**b. Need for Hearings**

SDG&E anticipates that the Commission may set this matter for hearing. SDG&E has provided a proposed schedule below.

**c. Issues to be Considered, Including Relevant Safety Considerations**

The issues to be considered, as described in this application and the supporting testimony, are whether the Commission should approve the changes to the DAC-GT, the CSGT and GTSR programs as in the public interest, including the path to cost recovery, as discussed in the testimony served in support of this application. In addition, the Rule 2.9 Request for Expedited Schedule to suspend GTSR should be considered.

**d. Proposed Schedules for application and Rule 2.9 Request for Expedited Schedule**

SDG&E proposes the following schedule for the bulk of the application, except for the GTSR suspension that is the subject of the attached Request for Expedited Schedule:

Application filed	May 31, 2022
Protests (if any) due	30 days from the date the notice of the filing of the Application appears in the Daily Calendar [approximately July 1, 2022]
Reply to Protests	10 days from the deadline for Protests [approximately July 11, 2022]

Pre-Hearing Conference	July 15, 2022
Scoping Memo	July 29, 2022
Intervenor Testimony due	September 6, 2022
Workshops	October 6-7, 2022
Rebuttal Testimony due	November 4, 2022
Hearings (if needed)	December 12, 2022
Concurrent Opening Briefs	February 6, 2023
Concurrent Reply Briefs	March 3, 2023
Proposed Decision	May 5, 2023
Comments on Proposed Decision	May 25, 2023
Replies to Comments to Proposed Decision	May 30, 2023
Final Commission Decision	July 2023

### **Request for Expedited Schedule**

Rule 2.9(d) sets forth the schedule to address a Request for Expedited Schedule:

(d) In an expedited proceeding, the assigned Commissioner and/or Administrative Law Judge shall notice a prehearing conference no later than 20 days from the date of preliminary categorization of the proceeding under Rule 7.1(a) and hold a prehearing conference no later than 30 days from the date of preliminary categorization. The notice shall inform parties that the proceeding has been designated as expedited and the assigned Commissioner may take comments from parties regarding the designation of the proceeding as expedited at the prehearing conference. In an expedited proceeding, a scoping memo shall be issued no later than 45 days from the date of preliminary categorization.

As noted above, SDG&E requests an expedited schedule solely for the purpose of resolving whether to suspend SDG&E's GTSR program. SDG&E submits that a separate

procedural schedule is appropriate for this narrow issue. Because D.15-01-051 (OP 14 at 183) provides that a utility may seek to suspend GTSR via a Tier 2 advice letter, the Commission already has already established that staff may dispose of such requests. Therefore, the full Commission need not pass on the suspension request, and it may be disposed of by an Administrative Law Judge or assigned Commissioner ruling based on the substance of this application alone. And, suspension does not determine the merits of any future form of GTSR. That issue is appropriate for resolving in the context of litigating the rest of the application on the Rule 2.1 schedule noted above.

**B. Rule 2.2 – Articles of Incorporation**

A copy of SDG&E's Restated Articles of Incorporation as last amended, presently in effect and certified by the California Secretary of State, was previously filed with the Commission on September 10, 2014, in connection with SDG&E Application 14-09-008, and is incorporated herein by reference.

**C. Rule 3.2 – Authority to Change Rates**

In accordance with Rule 3.2 (a) – (d) of the Commission's Rules of Practice and Procedure, SDG&E provides the following information.<sup>33</sup>

**1. Rule 3.2(a)(1) – Balance Sheet**

SDG&E's financial statement, balance sheet and income statement for the twelve-month period ending December 2021 are included with this application as Appendix A.

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<sup>33</sup> Note Rule 3.2(a) (9) does not apply to SDG&E.

## **2. Rule 3.2(a)(2) – Statement of Effective Rates**

A statement of all of SDG&E's presently effective electric rates can be viewed electronically by accessing:  
<http://www.sdge.com/rates-regulations/current-and-effective-tariffs/current-and-effective-tariffs>.

Appendix B to this Application provides the current table of contents from SDG&E's electric tariffs on file with the Commission.

## **3. Rule 3.2(a)(3) – Statement of Proposed Rate Change**

No specific rate increases are being sought in this application. As a result of this application, the Commission could implement changes that would result in increased costs which would be passed through in rates to customers as increased costs to SDG&E for the services or commodities furnished by it.

## **4. Rule 3.2(a)(4) – Description of Property and Equipment**

SDG&E is in the business of generating, transmitting, and distributing electric energy to San Diego County and part of Orange County. SDG&E also purchases, transmits, and distributes natural gas to customers in San Diego County. SDG&E has electric transmission, distribution and service lines in San Diego, Orange, and Imperial Counties. This includes a composite 92% ownership in the 500,000 volt Southwest Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Palo Verde substation in Arizona. This also includes full ownership of the 500,000 volt Sunrise Powerlink including substations and transmission lines, which run through San Diego and Imperial Counties to the Imperial Valley substation. Gas facilities consist of the Moreno gas compressor station in Riverside County and the Rainbow compressor station located in San Diego County. The gas is transmitted through high and low-pressure distribution mains and service lines.

Applicant's original cost of utility plant, together with the related reserves for depreciation and amortization twelve-month period ending December 2021 is shown on the balance sheet included in Appendix C.

**5. Rule 3.2(a)(5) and (6) – Summary of Earnings**

A summary of SDG&E's earnings (for the total utility operations for the company) for the twelve-month period ending December 2021, is included as Appendix D to this application.

**6. Rule 3.2(a)(7) – Statement Regarding Tax Depreciation**

For financial statement purposes, depreciation of utility plant has been computed on a straight-line remaining life basis, at rates based on the estimated useful lives of plan properties. For federal income tax accrual purposes, SDG&E generally computes depreciation using the straight-line method for tax property additions prior to 1954, and liberalized depreciation, which includes Class Life and Asset Depreciation Range Systems, on tax property additions after 1954 and prior to 1981. For financial reporting and rate-fixing purposes, "flow through accounting" has been adopted for such properties. For tax property additions in years 1981 through 1986, SDG&E has computed its tax depreciation using the Accelerated Cost Recovery System. For years after 1986, SDG&E has computed its tax depreciation using the Modified Accelerated Cost Recovery Systems and, since 1982, has normalized the effects of the depreciation differences in accordance with the Economic Recovery Tax Act of 1981 and the Tax Reform Act of 1986.

**7. Rule 3.2(a)(8) – Proxy Statement**

A copy of the most recent proxy statement sent to all shareholders of SDG&E's parent company, Sempra Energy, dated March 29, 2022, mailed to the Commission on April 13, 2022, is incorporated herein by reference.



**8. Rule 3.2(a)(10) – Statement re Pass Through to Customers**

This application does not seek approval of a rate increase; as a result of this application, the Commission could implement changes that would result in increased costs which would be passed through to customers in rates as increased costs to SDG&E for the services or commodities furnished by it.

**9. Rule 3.2(b) – Notice to State, Cities and Counties**

In compliance with Rule 3.2 (b) of the Commission’s Rules of Practice and Procedure, SDG&E will, within twenty days after the filing of this application, mail a notice to the State of California and to the cities and counties in its service territory and to all those persons listed in Appendix E to this application.

**10. Rule 3.2(c) – Newspaper Publication**

Because this application does not propose a rate increase, no notice of this application will be published in newspapers of general circulation in each county in SDG&E’s service territory.

**11. Rule 3.2(d) – Bill Insert Notice**

Because this application does not propose a rate increase, no bill insert notice regarding this application will be provided.

**V. SERVICE**

This is a new application. No service list has been established. Accordingly, SDG&E will serve this application, testimony and related exhibits on parties to the service lists for A.12-01-008, et al., and R.14-07-002, et al. Due to the ongoing Corona virus (COVID-19) health crisis, our legal staff continues working from home. Accordingly, pursuant to CPUC COVID-19 Temporary Filing and Service Protocol for Formal Proceedings, paper copies of e-

filed documents will not be mailed to the Administrative Law Judge or to parties on the service lists.

## **VI. CONCLUSION**

WHEREFORE, SDG&E requests that the Commission grant SDG&E's Application, as described herein.

By: /s/ E. Gregory Barnes

E. Gregory Barnes

8330 Century Park Court, CP32D

San Diego, California 92123

Telephone: (858) 654-1583

Facsimile: (619) 699-5027

Email: [gbarnes@semprautilities.com](mailto:gbarnes@semprautilities.com)

Attorney for:

SAN DIEGO GAS & ELECTRIC COMPANY

May 31, 2022

## OFFICER VERIFICATION

Tashonda Taylor declares the following:

I am the Vice President of Customer Operations for San Diego Gas & Electric Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) TO REVIEW GREEN ACCESS PROGRAMS PURSUANT TO DECISIONS 18-06-027 AND 21-12-036 and REQUEST FOR EXPEDITED SCHEDULE** are true to my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 31, 2022, at San Diego, California.

By: /s/ Tashonda Taylor

Tashonda Taylor  
San Diego Gas & Electric Company  
Vice President, Customer Operations

## **APPENDIX A**

### **Balance Sheet and Statement of Income and Financial Statement**

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**DEC 2021**

<b>1. UTILITY PLANT</b>		<u>2021</u>
101	UTILITY PLANT IN SERVICE	\$ 22,957,464,588
102	UTILITY PLANT PURCHASED OR SOLD	-
104	UTILITY PLANT LEASED TO OTHERS	112,194,000
105	PLANT HELD FOR FUTURE USE	-
106	COMPLETED CONSTRUCTION NOT CLASSIFIED	-
107	CONSTRUCTION WORK IN PROGRESS	1,670,246,955
108	ACCUMULATED PROVISION FOR DEPRECIATION OF UTILITY PLANT	(6,934,212,886)
111	ACCUMULATED PROVISION FOR AMORTIZATION OF UTILITY PLANT	(905,166,124)
114	ELEC PLANT ACQUISITION ADJ	3,750,722
115	ACCUM PROVISION FOR AMORT OF ELECTRIC PLANT ACQUIS ADJ	(2,500,480)
118	OTHER UTILITY PLANT	2,019,797,324
119	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION OF OTHER UTILITY PLANT	(411,395,960)
120	NUCLEAR FUEL - NET	-
TOTAL NET UTILITY PLANT		<u>\$ 18,510,178,139</u>
 <b>2. OTHER PROPERTY AND INVESTMENTS</b>		
121	NONUTILITY PROPERTY	\$ 6,003,644
122	ACCUMULATED PROVISION FOR DEPRECIATION AND AMORTIZATION	(326,050)
158	NON-CURRENT PORTION OF ALLOWANCES	110,647,029
123	INVESTMENTS IN SUBSIDIARY COMPANIES	-
124	OTHER INVESTMENTS	-
125	SINKING FUNDS	-
128	OTHER SPECIAL FUNDS	1,011,945,076
175	LONG-TERM PORTION OF DERIVATIVE ASSETS	<u>52,855,769</u>
TOTAL OTHER PROPERTY AND INVESTMENTS		<u>\$ 1,181,125,468</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**ASSETS AND OTHER DEBITS**  
**DEC 2021**

**3. CURRENT AND ACCRUED ASSETS**

	2021
131 CASH	\$ 24,919,379
132 INTEREST SPECIAL DEPOSITS	-
134 OTHER SPECIAL DEPOSITS	-
135 WORKING FUNDS	-
136 TEMPORARY CASH INVESTMENTS	-
141 NOTES RECEIVABLE	-
142 CUSTOMER ACCOUNTS RECEIVABLE	690,440,956
143 OTHER ACCOUNTS RECEIVABLE	85,822,400
144 ACCUMULATED PROVISION FOR UNCOLLECTIBLE ACCOUNTS	(44,281,142)
145 NOTES RECEIVABLE FROM ASSOCIATED COMPANIES	-
146 ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	-
151 FUEL STOCK	-
152 FUEL STOCK EXPENSE UNDISTRIBUTED	-
154 PLANT MATERIALS AND OPERATING SUPPLIES	132,881,569
156 OTHER MATERIALS AND SUPPLIES	-
158 ALLOWANCES	123,916,690
158 LESS: NON-CURRENT PORTION OF ALLOWANCES	(110,647,029)
163 STORES EXPENSE UNDISTRIBUTED	-
164 GAS STORED	328,716
165 PREPAYMENTS	157,657,818
171 INTEREST AND DIVIDENDS RECEIVABLE	2,426,084
173 ACCRUED UTILITY REVENUES	85,445,637
174 MISCELLANEOUS CURRENT AND ACCRUED ASSETS	32,854,971
175 DERIVATIVE INSTRUMENT ASSETS	111,235,687
175 LESS: LONG -TERM PORTION OF DERIVATIVE INSTRUMENT ASSETS	(52,855,769)
TOTAL CURRENT AND ACCRUED ASSETS	\$ 1,240,145,967

**4. DEFERRED DEBITS**

181 UNAMORTIZED DEBT EXPENSE	\$ 44,096,807
182 UNRECOVERED PLANT AND OTHER REGULATORY ASSETS	2,592,280,895
183 PRELIMINARY SURVEY & INVESTIGATION CHARGES	311,787
184 CLEARING ACCOUNTS	75,907
185 TEMPORARY FACILITIES	808,960
186 MISCELLANEOUS DEFERRED DEBITS	371,285,065
188 RESEARCH AND DEVELOPMENT	-
189 UNAMORTIZED LOSS ON REACQUIRED DEBT	6,471,198
190 ACCUMULATED DEFERRED INCOME TAXES	121,184,972
TOTAL DEFERRED DEBITS	3,136,515,591

TOTAL ASSETS AND OTHER DEBITS	\$ 24,067,965,165
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**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**DEC 2021**

**5. PROPRIETARY CAPITAL**

	2021
201 COMMON STOCK ISSUED	\$ 291,458,395
204 PREFERRED STOCK ISSUED	-
207 PREMIUM ON CAPITAL STOCK	591,282,978
210 GAIN ON RETIRED CAPITAL STOCK	-
211 MISCELLANEOUS PAID-IN CAPITAL	802,165,368
214 CAPITAL STOCK EXPENSE	(24,605,640)
216 UNAPPROPRIATED RETAINED EARNINGS	6,598,399,584
219 ACCUMULATED OTHER COMPREHENSIVE INCOME	<u>(10,117,040)</u>
 TOTAL PROPRIETARY CAPITAL	 <u>\$ 8,248,583,645</u>

**6. LONG-TERM DEBT**

221 BONDS	\$ 6,417,859,000
223 ADVANCES FROM ASSOCIATED COMPANIES	-
224 OTHER LONG-TERM DEBT	-
225 UNAMORTIZED PREMIUM ON LONG-TERM DEBT	-
226 UNAMORTIZED DISCOUNT ON LONG-TERM DEBT	<u>(16,893,710)</u>
 TOTAL LONG-TERM DEBT	 <u>\$ 6,400,965,290</u>

**7. OTHER NONCURRENT LIABILITIES**

227 OBLIGATIONS UNDER CAPITAL LEASES - NONCURRENT	\$ 1,400,890,005
228.2 ACCUMULATED PROVISION FOR INJURIES AND DAMAGES	24,801,946
228.3 ACCUMULATED PROVISION FOR PENSIONS AND BENEFITS	29,490,029
228.4 ACCUMULATED MISCELLANEOUS OPERATING PROVISIONS	-
244 LONG TERM PORTION OF DERIVATIVE LIABILITIES	11,316,894
230 ASSET RETIREMENT OBLIGATIONS	<u>889,835,240</u>
 TOTAL OTHER NONCURRENT LIABILITIES	 <u>\$ 2,356,334,114</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**BALANCE SHEET**  
**LIABILITIES AND OTHER CREDITS**  
**DEC 2021**

**8. CURRENT AND ACCRUED LIABILITIES**

	2021
231	NOTES PAYABLE
232	ACCOUNTS PAYABLE
233	NOTES PAYABLE TO ASSOCIATED COMPANIES
234	ACCOUNTS PAYABLE TO ASSOCIATED COMPANIES
235	CUSTOMER DEPOSITS
236	TAXES ACCRUED
237	INTEREST ACCRUED
238	DIVIDENDS DECLARED
241	TAX COLLECTIONS PAYABLE
242	MISCELLANEOUS CURRENT AND ACCRUED LIABILITIES
243	OBLIGATIONS UNDER CAPITAL LEASES - CURRENT
244	DERIVATIVE INSTRUMENT LIABILITIES
244	LESS: LONG-TERM PORTION OF DERIVATIVE LIABILITIES
245	DERIVATIVE INSTRUMENT LIABILITIES - HEDGES
	\$ 775,767,324
	631,812,212
	-
	96,613,566
	39,847,594
	9,883,625
	50,435,589
	-
	9,116,331
	237,466,246
	56,606,669
	32,605,788
	(11,316,894)
	-
	\$ 1,928,838,050

**9. DEFERRED CREDITS**

252	CUSTOMER ADVANCES FOR CONSTRUCTION	\$ 119,826,334
253	OTHER DEFERRED CREDITS	444,594,052
254	OTHER REGULATORY LIABILITIES	2,169,772,983
255	ACCUMULATED DEFERRED INVESTMENT TAX CREDITS	13,106,071
257	UNAMORTIZED GAIN ON REACQUIRED DEBT	-
281	ACCUMULATED DEFERRED INCOME TAXES - ACCELERATED	-
282	ACCUMULATED DEFERRED INCOME TAXES - PROPERTY	1,944,133,637
283	ACCUMULATED DEFERRED INCOME TAXES - OTHER	441,810,989
		5,133,244,066
	TOTAL DEFERRED CREDITS	5,133,244,066
		\$ 24,067,965,165



**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**DEC 2021**

**1. UTILITY OPERATING INCOME**

400	OPERATING REVENUES		\$	6,060,135,745
401	OPERATING EXPENSES	3,491,009,710		
402	MAINTENANCE EXPENSES	272,403,394		
403-7	DEPRECIATION AND AMORTIZATION EXPENSES	869,915,884		
408.1	TAXES OTHER THAN INCOME TAXES	205,954,128		
409.1	INCOME TAXES	64,605,354		
410.1	PROVISION FOR DEFERRED INCOME TAXES	341,570,424		
411.1	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(194,599,724)		
411.4	INVESTMENT TAX CREDIT ADJUSTMENTS	(271,798)		
411.6	GAIN FROM DISPOSITION OF UTILITY PLANT	-		
	TOTAL OPERATING REVENUE DEDUCTIONS			<u>5,050,587,372</u>
	NET OPERATING INCOME			1,009,548,373

**2. OTHER INCOME AND DEDUCTIONS**

415	REVENUE FROM MERCHANDISING, JOBBING AND CONTRACT WORK	-		
417	REVENUES OF NONUTILITY OPERATIONS	-		
417.1	EXPENSES OF NONUTILITY OPERATIONS	(9,029,242)		
418	NONOPERATING RENTAL INCOME	37,363		
418.1	EQUITY IN EARNINGS OF SUBSIDIARIES	-		
419	INTEREST AND DIVIDEND INCOME	7,183,019		
419.1	ALLOWANCE FOR OTHER FUNDS USED DURING CONSTRUCTION	81,462,879		
421	MISCELLANEOUS NONOPERATING INCOME	90,738		
421.1	GAIN ON DISPOSITION OF PROPERTY	2,015,252		
	TOTAL OTHER INCOME	<u>81,760,009</u>		
421.2	LOSS ON DISPOSITION OF PROPERTY	-		
425	MISCELLANEOUS AMORTIZATION	250,048		
426	MISCELLANEOUS OTHER INCOME DEDUCTIONS	51,244,126		
	TOTAL OTHER INCOME DEDUCTIONS	<u>\$ 51,494,174</u>		
408.2	TAXES OTHER THAN INCOME TAXES	843,356		
409.2	INCOME TAXES	(16,967,354)		
410.2	PROVISION FOR DEFERRED INCOME TAXES	7,695,860		
411.2	PROVISION FOR DEFERRED INCOME TAXES - CREDIT	(1,258,307)		
	TOTAL TAXES ON OTHER INCOME AND DEDUCTIONS	<u>\$ (9,686,445)</u>		
	TOTAL OTHER INCOME AND DEDUCTIONS		\$	<u>39,952,280</u>
	INCOME BEFORE INTEREST CHARGES			1,049,500,653
	EXTRAORDINARY ITEMS AFTER TAXES			-
	NET INTEREST CHARGES*			<u>230,247,751</u>
	NET INCOME		\$	<u><u>819,252,902</u></u>

\*NET OF ALLOWANCE FOR BORROWED FUNDS USED DURING CONSTRUCTION, (\$24,279,916)

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**STATEMENT OF INCOME AND RETAINED EARNINGS**  
**DEC 2021**

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**3. RETAINED EARNINGS**

RETAINED EARNINGS AT BEGINNING OF PERIOD, AS PREVIOUSLY REPORTED	\$ 6,079,146,682
NET INCOME (FROM PRECEDING PAGE)	819,252,902
DIVIDEND TO PARENT COMPANY	-
DIVIDENDS DECLARED - PREFERRED STOCK	-
DIVIDENDS DECLARED - COMMON STOCK	
OTHER RETAINED EARNINGS ADJUSTMENTS	
RETAINED EARNINGS AT END OF PERIOD	<u>\$ 6,898,399,584</u>

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**FINANCIAL STATEMENT**  
December 31, 2021

<b>(a) Amounts and Kinds of Stock Authorized:</b>				
Common Stock		255,000,000	shares	Without Par Value
<b>Amounts and Kinds of Stock Outstanding:</b>				
Common Stock		116,583,358	shares	291,458,395

**(b) Brief Description of Mortgage:**

Full information as to this item is given in Decision Nos. 93-09-069, 04-01-009, 06-05-015, 08-07-029, 10-10-023, 12-03-005, 15-08-011, 18-02-012, and 20-04-015 to which references are hereby made.

**(c) Number and Amount of Bonds Authorized and Issued:**

First Mortgage Bonds:	Nominal Date of Issue	Par Value Authorized and Issued	Outstanding	Interest Paid as of Q4' 2021
5.35% Series BBB, due 2035	05-19-05	250,000,000	250,000,000	13,375,000
6.00% Series DDD, due 2026	06-08-06	250,000,000	250,000,000	15,000,000
6.125% Series FFF, due 2037	09-20-07	250,000,000	250,000,000	15,312,500
6.00% Series GGG, due 2039	05-14-09	300,000,000	300,000,000	18,000,000
5.35% Series HHH, due 2040	05-13-10	250,000,000	250,000,000	13,375,000
4.50% Series III, due 2040	08-26-10	500,000,000	500,000,000	22,500,000
3.00% Series JJJ, due 2021	08-18-11	350,000,000	0	10,500,000
3.95% Series LLL, due 2041	11-17-11	250,000,000	250,000,000	9,875,000
4.30% Series MMM, due 2042	03-22-12	250,000,000	250,000,000	10,750,000
3.60% Series NNN, due 2023	09-09-13	450,000,000	450,000,000	16,200,000
1.9140% Series PPP, due 2022	03-12-15	250,000,000	16,319,110	854,496
2.50% Series QQQ, due 2026	05-19-16	500,000,000	500,000,000	12,500,000
3.75% Series RRR, due 2047	06-08-17	400,000,000	400,000,000	15,000,000
4.15% Series SSS, due 2048	05-17-18	400,000,000	400,000,000	16,600,000
4.10% Series TTT, due 2049	05-31-19	400,000,000	400,000,000	16,400,000
3.32% Series UUU, due 2050	04-07-20	400,000,000	400,000,000	13,280,000
1.70% Series VVV, due 2030	09-22-20	800,000,000	800,000,000	13,713,333
2.95% Series WWW, due 2051	08-13-21	750,000,000	750,000,000	-
<b>Total First Mortgage Bonds:</b>		<b>7,000,000,000</b>	<b>6,416,319,110</b>	<b>233,235,329</b>
<b>Total Bonds:</b>		<b>7,000,000,000</b>	<b>6,416,319,110</b>	<b>233,235,329</b>

<b>TOTAL LONG-TERM DEBT</b>		<b>7,000,000,000</b>	<b>6,416,319,110</b>	<b>233,235,329</b>
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1. Bond series PPP reduced by SONGS regulatory asset per 2014 SONGS settlement agreement.

**SAN DIEGO GAS & ELECTRIC COMPANY  
FINANCIAL STATEMENT**

December 31, 2021

Other Indebtedness	Date of Issue	Date of Maturity	Interest Rate	Outstanding	Interest Paid 2021
Commercial Paper & ST Bank Loans	Various	Various	Various	775,767,324	\$1,818,092

Amounts and Rates of Dividends Declared:

The amounts and rates of dividends during the past five fiscal years are as follows:

Preferred Stock	Shares Outstanding	2017	2018	2019	2020	2021
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
<b>Total</b>	-	-	-	-	-	-

Common Stock	2017	2018	2019	2020	2021
Dividend to Parent [1]	450,000,000	250,000,000	-	200,000,000	300,000,000

[1] San Diego Gas & Electric Company dividend to parent.

**APPENDIX B**

**Statement of Present Rates**



San Diego Gas & Electric Company  
San Diego, California

Revised	Cal. P.U.C. Sheet No.	36297-E
Canceling	Revised	Cal. P.U.C. Sheet No.
		35989-E

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Sheet 1

The following sheets contain all the effective rates and rules affecting rates, service and information relating thereto, in effect on the date indicated herein.

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(Continued)

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**Dan Skopec**  
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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35916-E  
Canceling Revised Cal. P.U.C. Sheet No. 35700-E

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San Diego Gas & Electric Company  
San Diego, California

Revised	Cal. P.U.C. Sheet No.	35701-E
Canceling	Revised	Cal. P.U.C. Sheet No.
		35486-E

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3C5	Issued by	Submitted	Dec 28, 2021
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San Diego Gas & Electric Company  
San Diego, California

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Canceling	Revised	Cal. P.U.C. Sheet No.
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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 36115-E  
Canceling Revised Cal. P.U.C. Sheet No. 35920-E

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5C8	Issued by	Submitted	Apr 14, 2022
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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 36298-E  
Canceling Revised Cal. P.U.C. Sheet No. 35990-E

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(Continued)

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35636-E  
Canceling Revised Cal. P.U.C. Sheet No. 35620-E

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Decision No. 16-01-045

Issued by  
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Vice President  
Regulatory Affairs

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35954-E  
Canceling Revised Cal. P.U.C. Sheet No. 35300-E

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8C5 Issued by Submitted Feb 1, 2022  
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San Diego Gas & Electric Company  
San Diego, California

	Revised	Cal. P.U.C. Sheet No.	35665-E
Canceling	Revised	Cal. P.U.C. Sheet No.	35022-E

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 32352-E  
Canceling Revised Cal. P.U.C. Sheet No. 31945-E

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San Diego, California

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Canceling Revised Cal. P.U.C. Sheet No. 34180-E

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San Diego, California

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Canceling Revised Cal. P.U.C. Sheet No. 33316-E

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San Diego, California

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142-02769	07-14	NEM Aggregation Form...	25293-E
142-02770	12-12	Generation Credit Allocation Request Form...	23288-E
142-02771	08-16	Rule 21 Generator Interconnection Agreement (GIA)...	28051-E
142-02772	06-14	Rule 21 Detailed Study Agreement...	25065-E
142-02773	08-16	Interconnection App for Solar and/or Wind ONLY >30 Kw...	29492-E
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142-02775	07-20	Net Energy Metering Non-Export / Non-Import Power Control Based Equipment Attestation	33417-E
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142-4035	06-05	Application for California Alternate Rates for Energy (CARE) Program for Migrant Farm Worker Housing Centers...	18415-E
142-05200	08-16	Generator Interconnection Agreement for Fast Track Process...	28054-E
142-05201	08-16	Exporting Generating Facility Interconnection Request...	28055-E
142-05202	01-01	Generating Facility Interconnection Application Agreement...	14152-E
142-05203	07-21	Generating Facility Interconnection Application...	35023-E
142-05204	07-16	Rule 21 Pre-Application Report Request...	27744-E
142-05205	07-02	Optional Binding Mandatory Curtailment Plan Contract...	17729-E
142-05207	06-19	Base Interruptible Program Contract...	32132-E
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142-05210	06-04	Rolling Blackout Reduction Program Contract...	18273-E
142-05211	06-04	Bill Protection Application...	18273-E
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142-05216	06-19	Notice by Aggregator to Add, Change or Delete Customers for BIP...	32135-E
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142-05300	07-18	Capacity Bidding Program Customer Contract...	30801-E
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142-05302	02-18	Notice to Add, Change, or Terminate Aggregator for Capacity Bidding...	30210-E

(Continued)

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Vice President  
Regulatory Affairs

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San Diego Gas & Electric Company  
San Diego, California

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142-0542	06-17	(3 <sup>rd</sup> Party Inadvertent Export)	29059-E
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142-0543	06-17	(3 <sup>rd</sup> Party Non-Exporting)	29060-E
		Generating Facility Interconnection Agreement	
142-0544	06-17	(Inadvertent Export)	19323-E
		Generating Facility Interconnection Agreement (Continuous Export)	
142-0545	06-06	Generation Bill Credit Transfer Allocation Request Form	21852-E
142-0546	11-21	Local Government – Generation Bill Credit Transfer Allocation Request Form (RES-BCT)	35617-E
142-0600	06-13	SDG&E's Final Standard Form Re-Mat PPA	23604-E
143-359		Service Agreement between the Customer and SDG&E for Optional UDC Meter Services	
143-00212		Resident's Agreement for Water Heater Switch Credit	
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14C12

Issued by

Submitted

Nov 24, 2021

Advice Ltr. No. 3893-E

**Dan Skopec**

Effective

Dec 24, 2021

Vice President

Decision No. Senate Bill  
No. 479

Regulatory Affairs

Resolution No.



San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 35483-E  
Canceling Revised Cal. P.U.C. Sheet No. 34962-E

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Issued by  
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Effective Oct 4, 2021

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San Diego Gas & Electric Company  
San Diego, California

Original Cal. P.U.C. Sheet No. 31176-E

Canceling Cal. P.U.C. Sheet No.

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(Continued)

16C15

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San Diego Gas & Electric Company  
San Diego, California

Revised Cal. P.U.C. Sheet No. 34139-E  
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Advice Ltr. No. 3685-E

Decision No. 20-06-003

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**Dan Skopec**  
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Regulatory Affairs

Submitted Feb 5, 2021  
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Resolution No.

## **APPENDIX C**

### **Cost of Property and Depreciation Reserve**

**SAN DIEGO GAS & ELECTRIC COMPANY**

**COST OF PROPERTY AND  
DEPRECIATION RESERVE APPLICABLE THERETO  
AS OF DECEMBER 31, 2021**

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
<b>ELECTRIC DEPARTMENT</b>			
302	Franchises and Consents	222,841.36	202,900.30
303	Misc. Intangible Plant	192,873,040.52	174,609,265.11
	Intangible Contra Accounts	(979,446.23)	(645,309.19)
	<b>TOTAL INTANGIBLE PLANT</b>	<b>192,116,435.65</b>	<b>174,166,856.22</b>
310.1	Land	14,526,518.29	46,518.29
310.2	Land Rights	0.00	0.00
311	Structures and Improvements	91,430,154.47	55,487,081.40
312	Boiler Plant Equipment	165,056,670.14	100,354,708.67
314	Turbogenerator Units	133,511,708.78	68,536,671.39
	Palomar Contra E-314	(772,160.26)	(348,023.07)
315	Accessory Electric Equipment	86,961,890.56	54,443,312.07
316	Miscellaneous Power Plant Equipment	65,735,929.97	23,015,706.54
		0.00	0.00
	Palomar Contra E-316	(849,751.57)	(330,954.73)
	<b>TOTAL STEAM PRODUCTION</b>	<b>555,600,960.38</b>	<b>301,205,020.56</b>
			(5,921,034.94)
340.1	Land	224,368.91	0.00
340.2	Land Rights	2,427.96	2,427.96
341	Structures and Improvements	24,895,662.62	13,008,974.08
342	Fuel Holders, Producers & Accessories	21,651,513.75	11,085,098.24
343	Prime Movers	94,666,257.32	57,641,706.35
344	Generators	336,317,678.69	165,135,282.17
345	Accessory Electric Equipment	33,017,968.94	19,665,721.03
346	Miscellaneous Power Plant Equipment	68,844,093.51	22,195,749.71
	<b>TOTAL OTHER PRODUCTION</b>	<b>579,619,971.70</b>	<b>288,734,959.54</b>
	<b>TOTAL ELECTRIC PRODUCTION</b>	<b>1,135,220,932.08</b>	<b>589,939,980.10</b>



<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
350.1	Land	83,917,793.78	0.00
350.2	Land Rights	172,533,215.05	30,121,029.48
352	Structures and Improvements	751,849,027.07	122,728,357.91
353	Station Equipment	2,172,726,428.41	532,734,981.78
354	Towers and Fixtures	929,375,373.23	254,068,408.58
355	Poles and Fixtures	982,049,690.38	174,687,891.92
355	Pole retirement error correction-top side	0.00	0.00
356	Overhead Conductors and Devices	867,149,750.26	287,529,210.24
357	Underground Conduit	560,488,238.56	102,870,264.63
358	Underground Conductors and Devices	570,072,433.83	102,689,341.35
359	Roads and Trails	380,158,921.29	55,439,172.07
	<b>TOTAL TRANSMISSION</b>	<b>7,470,320,871.86</b>	<b>1,662,868,657.96</b>
360.1	Land	17,456,813.30	0.00
360.2	Land Rights	97,231,077.73	50,592,996.71
361	Structures and Improvements	13,264,653.89	2,691,428.26
362	Station Equipment	661,385,746.51	283,073,035.53
363	Storage Battery Equipment	182,749,594.02	69,737,860.09
364	Poles, Towers and Fixtures	1,033,663,057.50	309,969,458.32
364	Pole retirement error correction-top side	0.00	0.00
365	Overhead Conductors and Devices	1,159,382,561.81	262,860,745.98
366	Underground Conduit	1,697,241,554.09	614,581,589.24
367	Underground Conductors and Devices	1,994,588,616.86	1,064,987,854.43
368.1	Line Transformers	760,142,968.73	275,133,948.93
368.2	Protective Devices and Capacitors	35,468,093.92	17,379,989.03
369.1	Services Overhead	296,266,703.98	102,990,922.01
369.2	Services Underground	409,836,266.07	282,855,156.73
370.1	Meters	213,532,310.66	141,597,625.50
370.2	Meter Installations	73,459,413.92	38,803,072.40
371	Installations on Customers' Premises	74,952,471.44	30,867,164.88
373.1	St. Lighting & Signal Sys.-Transformers	0.00	0.00
373.2	Street Lighting & Signal Systems	35,792,500.40	23,884,552.73
		0.00	(5,242,057.14)
	<b>TOTAL DISTRIBUTION PLANT</b>	<b>8,756,414,404.83</b>	<b>3,566,765,343.63</b>
389.1	Land	7,312,142.54	0.00
389.2	Land Rights	0.00	0.00
390	Structures and Improvements	45,469,034.54	29,716,929.22
392.1	Transportation Equipment - Autos	0.00	49,884.21
392.2	Transportation Equipment - Trailers	58,145.67	26,359.51
393	Stores Equipment	46,031.37	6,392.25
394.1	Portable Tools	40,618,835.97	12,911,167.64
394.2	Shop Equipment	278,147.42	234,159.24
395	Laboratory Equipment	5,336,019.09	1,692,658.06
396	Power Operated Equipment	60,528.93	117,501.67
397	Communication Equipment	416,424,757.44	173,338,620.07
398	Miscellaneous Equipment	3,299,080.85	1,443,862.30
	<b>TOTAL GENERAL PLANT</b>	<b>518,902,723.82</b>	<b>219,537,534.17</b>
101	<b>TOTAL ELECTRIC PLANT</b>	<b>18,072,975,368.24</b>	<b>6,213,278,372.08</b>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
<b>GAS PLANT</b>			
302	Franchises and Consents	86,104.20	86,104.20
303	Miscellaneous Intangible Plant	0.00	0.00
	TOTAL INTANGIBLE PLANT	86,104.20	86,104.20
360.1	Land	0.00	0.00
361	Structures and Improvements	0.00	0.00
362.1	Gas Holders	0.00	0.00
362.2	Liquefied Natural Gas Holders	0.00	0.00
363	Purification Equipment	0.00	0.00
363.1	Liquefaction Equipment	0.00	0.00
363.2	Vaporizing Equipment	0.00	0.00
363.3	Compressor Equipment	0.00	0.00
363.4	Measuring and Regulating Equipment	0.00	0.00
363.5	Other Equipment	0.00	0.00
363.6	LNG Distribution Storage Equipment	2,168,803.11	1,495,409.71
	TOTAL STORAGE PLANT	2,168,803.11	1,495,409.71
365.1	Land	4,649,143.75	0.00
365.2	Land Rights	3,514,781.26	1,709,786.44
366	Structures and Improvements	23,219,943.30	12,154,359.54
367	Mains	462,339,034.93	103,080,064.01
368	Compressor Station Equipment	105,008,385.34	77,017,882.31
369	Measuring and Regulating Equipment	29,131,175.17	19,267,038.25
371	Other Equipment	2,842,373.52	389,713.45
	TOTAL TRANSMISSION PLANT	630,704,837.27	213,618,844.00
374.1	Land	1,514,272.84	0.00
374.2	Land Rights	8,517,871.65	7,606,667.22
375	Structures and Improvements	43,446.91	61,253.10
376	Mains	1,510,244,025.46	468,957,939.68
376	Top-side retirement adjustment	(3,359,331.00)	(3,359,331.00)
378	Measuring & Regulating Station Equipment	21,185,573.43	10,232,230.83
380	Distribution Services	523,249,606.93	312,035,412.54
380	Top-side retirement adjustment	(893,247.00)	(893,247.00)
381	Meters and Regulators	188,284,846.11	85,205,658.70
382	Meter and Regulator Installations	125,662,705.77	51,112,551.39
385	Ind. Measuring & Regulating Station Equipment	1,516,810.70	1,349,359.91
386	Other Property On Customers' Premises	0.00	0.00
387	Other Equipment	11,397,017.90	7,043,793.30
	TOTAL DISTRIBUTION PLANT	2,387,363,599.70	939,352,288.67

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
392.1	Transportation Equipment - Autos	0.00	25,503.00
392.2	Transportation Equipment - Trailers	0.00	0.13
394.1	Portable Tools	24,533,281.96	5,295,729.10
394.2	Shop Equipment	63,820.21	33,111.88
395	Laboratory Equipment	0.00	(7,344.15)
396	Power Operated Equipment	0.00	(1,088.04)
397	Communication Equipment	2,256,363.98	1,126,597.41
398	Miscellaneous Equipment	465,787.29	192,692.54
	TOTAL GENERAL PLANT	27,319,253.44	6,665,201.87
101	TOTAL GAS PLANT	3,047,642,597.72	1,161,217,848.45
<b>COMMON PLANT</b>			
303	Miscellaneous Intangible Plant	2,560,001.47	601,279.55
303	Miscellaneous Intangible Plant	906,876,064.38	450,872,363.21
	Common Contra Account	(4,128,951.21)	(2,042,946.65)
350.1	Land	0.00	0.00
360.1	Land	0.00	0.00
389.1	Land	7,494,796.01	0.00
389.2	Land Rights	27,776.34	27,776.34
390	Structures and Improvements	562,683,691.02	195,013,888.18
391.1	Office Furniture and Equipment - Other	40,037,638.27	14,284,666.65
391.2	Office Furniture and Equipment - Computer E	123,080,020.74	60,647,400.51
	Common Contra Account	(19,579.43)	(13,576.82)
392.1	Transportation Equipment - Autos	406,252.33	283,070.59
392.2	Transportation Equipment - Trailers	107,977.72	19,012.88
392.3	Transportation Equipment - Aviation	12,139,287.63	4,638,891.48
393	Stores Equipment	332,982.68	72,500.17
394.1	Portable Tools	1,520,840.18	676,248.01
394.2	Shop Equipment	142,759.33	98,817.49
394.3	Garage Equipment	1,837,003.62	674,883.38
395	Laboratory Equipment	1,731,094.98	1,017,410.68
396	Power Operated Equipment	0.00	(192,979.10)
397	Communication Equipment	353,877,194.16	130,419,383.83
398	Miscellaneous Equipment	3,585,062.47	833,853.20
118.1	TOTAL COMMON PLANT	2,014,291,912.69	857,931,943.58
	TOTAL ELECTRIC PLANT	18,072,975,368.24	6,213,278,372.08
	TOTAL GAS PLANT	3,047,642,597.72	1,161,217,848.45
	TOTAL COMMON PLANT	2,014,291,912.69	857,931,943.58
101 & 118.1	TOTAL	23,134,909,878.65	8,232,428,164.11
101	PLANT IN SERV-SONGS FULLY RECOVERE	0.00	0.00
101	PLANT IN SERV-ELECTRIC NON-RECON		
	Electric	0.00	0.00
	Gas	0.00	0.00
	Common	0.00	0.00
		0.00	0.00

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
101	PLANT IN SERV-CLOUD CONTRA		
	Electric	0.00	0.00
	Common	(2,560,001.47)	(601,279.54)
		<u>(2,560,001.47)</u>	<u>(601,279.54)</u>
101	PLANT IN SERV-PP TO SAP OUT OF BAL		
	Electric	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
118	PLANT IN SERV-COMMON NON-RECON		
	Common - Transferred Asset Adjustment	(1,494,846.06)	(1,494,846.06)
		<u>(1,494,846.06)</u>	<u>(1,494,846.06)</u>
101	Accrual for Retirements		
	Electric	(18,045,623.12)	(18,045,623.12)
	Gas	(1,083,652.16)	(1,083,652.16)
		<u>(1,083,652.16)</u>	<u>(1,083,652.16)</u>
	TOTAL PLANT IN SERV-ACCRUAL FOR RE	<u>(19,129,275.28)</u>	<u>(19,129,275.28)</u>
102	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT PURCHASED OR SOLD	<u>0.00</u>	<u>0.00</u>
104	Electric	112,194,000.02	31,472,139.03
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT LEASED TO OTHERS	<u>112,194,000.02</u>	<u>31,472,139.03</u>
105	Plant Held for Future Use		
	Electric	0.00	0.00
	Gas	0.00	0.00
		<u>0.00</u>	<u>0.00</u>
	TOTAL PLANT HELD FOR FUTURE USE	<u>0.00</u>	<u>0.00</u>
107	Construction Work in Progress		
	Electric	1,110,158,229.73	
	Gas	202,750,289.65	
	Common	348,966,590.69	
		<u>348,966,590.69</u>	
	TOTAL CONSTRUCTION WORK IN PROGRESS	<u>1,661,875,110.07</u>	<u>0.00</u>

<u>No.</u>	<u>Account</u>	<u>Original Cost</u>	<u>Reserve for Depreciation and Amortization</u>
108.5	Accumulated Nuclear Decommissioning Electric	<u>0.00</u>	<u>1,011,036,366.19</u>
	TOTAL ACCUMULATED NUCLEAR DECOMMISSIONING	<u>0.00</u>	<u>1,011,036,366.19</u>
101.1	ELECTRIC CAPITAL LEASES	1,307,422,019.46	89,992,021.28
118.1	COMMON CAPITAL LEASE	<u>78,245,616.50</u>	<u>22,712,334.83</u>
		1,385,667,635.96	112,704,356.11
143	FAS 143 ASSETS - Legal Obligation	4,047,286.44	(1,002,002,548.34)
	SONGS Plant Closure - FAS 143 contra	0.00	0.00
	FIN 47 ASSETS - Non-Legal Obligation	174,761,633.00	55,671,046.33
143	FAS 143 ASSETS - Legal Obligation	<u>0.00</u>	<u>(2,012,358,289.84)</u>
	TOTAL FAS 143	178,808,919.44	(2,958,689,791.85)
	UTILITY PLANT TOTAL	<u>26,450,271,421.33</u>	<u>6,407,725,832.71</u>

**APPENDIX D**

**Summary of Earnings**

**SAN DIEGO GAS & ELECTRIC COMPANY**  
**SUMMARY OF EARNINGS**  
**DEC 2021**  
**(\$ IN MILLIONS)**

Line No.	Item	Amount
1	Operating Revenue	\$ 6,060
2	Operating Expenses	<u>5,051</u>
3	Net Operating Income	<u>\$ 1,010</u>
4	Weighted Average Rate Base	\$ 12,527
5	Rate of Return*	7.55%

\*Authorized Cost of Capital

## **APPENDIX E**

### **Governmental Entities Receiving Notice**



State of California  
Attorney General's Office  
P.O. Box 944255  
Sacramento, CA 94244-2550

Naval Facilities Engineering  
Command  
Navy Rate Intervention  
1314 Harwood Street SE  
Washing Navy Yard, DC 20374

City of Carlsbad  
Attn. City Attorney  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008-19589

City of Chula Vista  
Attn. City Attorney  
276 Fourth Ave  
Chula Vista, Ca 91910-2631

City of Dana Point  
Attn. City Attorney  
33282 Golden Lantern  
Dana Point, CA 92629

City of Del Mar  
Attn. City Clerk  
1050 Camino Del Mar  
Del Mar, CA 92014

City of Encinitas  
Attn. City Attorney  
505 S. Vulcan Ave.  
Encinitas, CA 92024

City of Escondido  
Attn. City Attorney  
201 N. Broadway  
Escondido, CA 92025

City of Imperial Beach  
Attn. City Clerk  
825 Imperial Beach Blvd  
Imperial Beach, CA 92032

City of Laguna Beach  
Attn. City Clerk  
505 Forest Ave  
Laguna Beach, CA 92651

State of California  
Attn. Director Dept of General  
Services  
PO Box 989052  
West Sacramento, CA 95798-9052

Alpine County  
Attn. County Clerk  
99 Water Street, P.O. Box 158  
Markleeville, CA 96120

City of Carlsbad  
Attn. Office of the County Clerk  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008-19589

City of Coronado  
Attn. Office of the City Clerk  
1825 Strand Way  
Coronado, CA 92118

City of Dana Point  
Attn. City Clerk  
33282 Golden Lantern  
Dana Point, CA 92629

City of El Cajon  
Attn. City Clerk  
200 Civic Way  
El Cajon, CA 92020

City of Encinitas  
Attn. City Clerk  
505 S. Vulcan Ave.  
Encinitas, CA 92024

City of Fallbrook  
Chamber of Commerce  
Attn. City Clerk  
111 S. Main Avenue  
Fallbrook, CA 92028

City of Imperial Beach  
Attn. City Attorney  
825 Imperial Beach Blvd  
Imperial Beach, CA 92032

City of Laguna Beach  
Attn. City Attorney  
505 Forest Ave  
Laguna Beach, CA 92651

Department of U.S. Administration  
General Services Administration  
300 N. Los Angeles St. #3108  
Los Angeles, CA 90012

Borrego Springs Chamber of  
Commerce Attn. City Clerk  
786 Palm Canyon Dr  
PO Box 420  
Borrego Springs CA 92004-0420

City of Chula Vista  
Attn: Office of the City Clerk  
276 Fourth Avenue  
Chula Vista, California 91910-2631

City of Coronado  
Attn. City Attorney  
1825 Strand Way  
Coronado, CA 92118

City of Del Mar  
Attn. City Attorney  
1050 Camino Del Mar  
Del Mar, CA 92014

City of El Cajon  
Attn. City Attorney  
200 Civic Way  
El Cajon, CA 92020

City of Escondido  
Attn. City Clerk  
201 N. Broadway  
Escondido, CA 92025

City of Fallbrook  
Chamber of Commerce  
Attn. City Attorney  
111 S. Main Avenue  
Fallbrook, CA 92028

Julian Chamber of Commerce  
P.O. Box 1866  
2129 Main Street  
Julian, CA

City of Laguna Niguel  
Attn. City Attorney  
30111 Crown Valley Parkway  
Laguna Niguel, California 92677

City of Laguna Niguel  
Attn. City Clerk  
30111 Crown Valley Parkway  
Laguna Niguel, California 92677

City of Lakeside  
Attn. City Clerk  
9924 Vine Street  
Lakeside CA 92040

City of La Mesa  
Attn. City Attorney  
8130 Allison Avenue  
La Mesa, CA 91941

City of La Mesa  
Attn. City Clerk  
8130 Allison Avenue  
La Mesa, CA 91941

City of Lemon Grove  
Attn. City Clerk  
3232 Main St.  
Lemon Grove, CA 92045

City of Lemon Grove  
Attn. City Attorney  
3232 Main St.  
Lemon Grove, CA 92045

City of Mission Viejo  
Attn: City Clerk  
200 Civic Center  
Mission Viejo, CA 92691

City of Mission Viejo  
Attn: City Attorney  
200 Civic Center  
Mission Viejo, CA 92691

City of National City  
Attn. City Clerk  
1243 National City Blvd  
National City, CA 92050

City of National City  
Attn. City Attorney  
1243 National City Blvd  
National City, CA 92050

City of Oceanside  
Attn. City Clerk  
300 N. Coast Highway  
Oceanside, CA 92054-2885

City of Oceanside  
Attn. City Attorney  
300 N. Coast Highway  
Oceanside, CA 92054-2885

County of Orange  
Attn. County Counsel  
P.O. Box 1379  
Santa Ana, CA 92702

County of Orange  
Attn. County Clerk  
12 Civic Center Plaza, Room 101  
Santa Ana, CA 92701

City of Poway  
Attn. City Clerk  
P.O. Box 789  
Poway, CA 92064

City of Poway  
Attn. City Attorney  
P.O. Box 789  
Poway, CA 92064

City of Ramona  
Attn. City Clerk  
960 Main Street  
Ramona, CA 92065

City of Ramona  
Attn. City Attorney  
960 Main Street  
Ramona, CA 92065

City of San Diego  
Attn. Mayor  
202 C Street, 11<sup>th</sup> Floor  
San Diego, CA 92101

City of San Clemente  
Attn. City Clerk  
100 Avenida Presidio  
San Clemente, CA 92672

City of San Clemente  
Attn. City Attorney  
100 Avenida Presidio  
San Clemente, CA 92672

County of San Diego  
Attn. County Counsel  
1600 Pacific Hwy  
San Diego, CA 92101

County of San Diego  
Attn. County Clerk  
P.O. Box 121750  
San Diego, CA 92101

City of San Diego  
Attn. City Attorney  
1200 Third Ave.  
Suite 1620  
San Diego, CA 92101

City of San Diego  
Attn. City Clerk  
202 C Street, 2<sup>nd</sup> Floor  
San Diego, CA 92101

City of San Marcos  
Attn. City Attorney  
1 Civic Center Dr.  
San Marcos, CA 92069

City of San Marcos  
Attn. City Clerk  
1 Civic Center Dr.  
San Marcos, CA 92069

City of Santee  
Attn. City Clerk  
10601 Magnolia Avenue  
Santee, CA 92071

City of Santee  
Attn. City Attorney  
10601 Magnolia Avenue  
Santee, CA 92071

City of Solana Beach  
Attn. City Attorney  
635 S. Highway 101  
Solana Beach, CA 92075

Spring Valley Chamber of  
Commerce  
Attn. City Clerk  
3322 Sweetwater Springs Blvd,  
Ste. 202  
Spring Valley, CA 91977-3142

Valley Center Chamber of  
Commerce  
Attn. City Clerk  
P.O. Box 8  
Valley Center, CA 92082

City of Vista  
Attn. City Attorney  
200 Civic Center Drive, Bldg. K  
Vista, CA 92084

City of Vista  
Attn. City Clerk  
200 Civic Center Drive  
Vista, CA 92084

City of Aliso Viejo  
12 Journey  
Aliso Viejo, CA 92656

**ATTACHMENT (Rule 2.9)**  
**Request for Expedited Schedule**

## **(Rule 2.9) - REQUEST FOR EXPEDITED SCHEDULE**

SDG&E requests an expedited schedule for one discreet and severable issue within the scope of SDG&E's *Application to Review Green Access Programs Pursuant to Decisions 18-06-027 and 21-12-036* filed May 31, 2022. That issue concerns the suspension of SDG&E's GTSR program instituted per D.15-01-051, and it does not affect the remainder of this application, which may be resolved on a conventional Rule 2.1 schedule.<sup>34</sup> Per Rule 2.9(c), the assigned Commissioner may "grant a request for an expedited schedule if the attachment demonstrates specific facts, that constitute ... the need to resolve a financial matter expeditiously to avoid ratepayer harm." Below, SDG&E shows how an expedited schedule to immediately suspend SDG&E's GTSR program is required to avoid ratepayer harm here.

**Pertinent GTSR program elements:** D.15-01-051 required the IOUs to implement GTSR, and approved SDG&E's program that includes both (i) a green tariff option ("EcoChoice"), whereby bundled customers may choose to increase the amount of renewable energy provided by SDG&E; and (ii) an Enhanced Community Renewables option ("EcoShare"), whereby bundled customers may purchase renewable energy directly from third-party developers. After approval of implementing advice letters, SDG&E offered GTSR to customers starting in late 2016. GTSR rates are applied as a \$/kWh adder to a bundled customer's otherwise applicable tariff. Customers who depart bundled service for CCA or DA service are not eligible for GTSR. By statute, the rates are designed on indifference principles, meaning that GTSR participants may not shift program costs to nonparticipating customers.

**EcoChoice results:** Until 2020, most participating EcoChoice customers either received a \$/kWh bill credit or were charged a slight premium for the renewable portion of their bill. Thus, EcoChoice was attractive for the first years of the program, and enrollment neared its maximum capacity. The impact of recent CCA departures on current rates is described below.

**EcoShare results:** The GTSR decision sets a 20 MW EcoShare target, requiring SDG&E to reserve half (10 MW) of the target for projects sized between 500 kW and 1 MW located in areas

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<sup>34</sup> If this request for expedited schedule is granted, SDG&E expects the bulk of its application will be consolidated with those of the other IOUs, with a separate schedule set accordingly. Because Rule 2.9 limits this attachment to three pages, this request is a summary, and SDG&E incorporates by reference the more detailed explanation with supporting citations in its application and supporting testimony.

CalEPA identifies as the most impacted and disadvantaged communities (the Environmental Justice or EJ Reservation). The other half of the target may be met by projects between 500 kW and 20 MW located in SDG&E's service territory or the adjacent Imperial Valley. To date, no developers have currently executed PPAs with SDG&E to support EcoShare, and thus there have been no EcoShare enrollees.<sup>35</sup>

**Recent CCA departures make GTSR unsustainable:** SDG&E' had no CCA customer departures until June 2018, and, as noted, the program enjoyed stable and attractive rates. Recently, SDG&E's CCA departures have exploded; the City of San Diego - 40% of SDG&E's load - has commenced CCA implementation. SDG&E anticipates that about 52% of its bundled customers will depart bundled service by the end of 2022, making those customers ineligible for GTSR. Other local governments have declared the intent to implement CCA beginning in 2023, increasing the share of departed customers to more than 78%. Other jurisdictions could follow.

**Ratepayer harm:** Because GTSR is a commodity offering, the recent SDG&E customer exodus for CCA commodity service means that fixed program costs, and the cost of procuring renewable generation dedicated to the programs, must be spread over a small and shrinking number of customers, orders of magnitude lower than the customer base anticipated when the programs were designed and approved in 2012. The resulting participant rate impact is enormous. In 2016, the residential GTSR rate was about \$0.001 per kWh. In 2021 it soared above 5 cents per kWh, and for 2022, it is over 24 cents per kWh.<sup>36</sup>

**Attempts to mitigate ratepayer harm:** To mitigate ratepayer harm, SDG&E (i) filed AL 3920-E (December 17, 2021) requesting approval to suspend its GTSR programs, and (ii) launched an aggressive campaign in fall 2021 to inform customers of the coming rate increase. Energy Division denied AL 3920-E (letter dated April 19, 2022) stating that SDG&E should provide a detailed mitigation and suspension plan in this application. The marketing campaign has had some success; only .75 MW remain subscribed, down from 51.2 MW in January 2021, but 390

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<sup>35</sup> SDG&E suspects that there is no interest now in EcoShare by developers because the rates are still open only to bundled customers, of which SDG&E has very few.

<sup>36</sup> This situation appears unique to SDG&E. Most of PG&E's CCA departures took place before GTSR implementation, and the proportion of customers choosing CCA service for PG&E and SCE is much smaller than that for SDG&E, with program costs spread over both utilities' substantially larger customer base.

customers remain on GTSR at present. But the 2023 estimated average monthly GTSR rate (based on fewer customers forecast than today) is \$1.40 per kWh (including PCIA). That means an average residential GTSR customer with a demand of around 400 kWh that does not heed the customer education efforts will incur *a more than \$560 charge on top of their otherwise applicable rate*.

**The Commission can suspend the program now:** By statute, SDG&E must offer GTSR to all customers. D.15-01-051 (at 83) found that “under certain unique circumstances, such as risk of ratepayer exposure to excessive costs due to ... market malfunction, it may be necessary to authorize a rapid suspension of the GTSR Program.” SB 840 amended the GTSR statute in 2016 to remove the program sunset date. While finding that amendment barred absolute termination of a utility GTSR program, D.19-05-031 confirmed that suspension remains an available remedy in appropriate circumstances.<sup>37</sup> This decision (at 11) observed that the “intent” of this passage in D.15-01-051 “requires utilities to set forth proposals to resolve the issue before granting a suspension.” But D.19-05-031 did not dispute that the public interest might require immediate suspension. Nor did it imply that a fully baked resolution must be submitted, but only that a path forward is identified, which SDG&E submits with this application.<sup>38</sup> D.19-05-031 confirms that the Commission can immediately suspend SDG&E’s GTSR program on an expedited schedule and address future GTSR program design on the Rule 2.1 procedural course in this proceeding.

**Relief requested:** A ruling authorizing SDG&E to submit a Tier 1 AL to undertake the following near-term mitigation: (1) to close GTSR to new participants effective immediately; (2) to cease soliciting PPAs for GTSR during the suspension; (3) to inform existing EcoChoice customers about the approval of the advice letter and the suspension, and to immediately disenroll customers from GTSR who will remain on their otherwise applicable rate; (5) to update SDG&E’s GTSR website to add current suspension status and further educate customers who may seek information on the rates; and (6) to ramp down administrative program support of GTSR, excluding reporting.

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<sup>37</sup> *Id.* at 10-11 and Conclusion of Law 6 at 15 (“there is a distinction between ‘suspension’ and ‘termination’”).

<sup>38</sup> The staff denial of AL 3920-E is wrong that “Without ... [supplying an end date for suspension] ... [the AL] is in effect an early termination request.” The Commission is not bound by this staff interpretation.

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Application of San Diego Gas & Electric Company  
(U 902 E) to Review Green Access Programs Pursuant  
to Decisions 18-06-027 and 21-12-036.

Application 22-05-\_\_\_\_\_  
(Filed, May 31, 2022)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing **APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) TO REVIEW GREEN ACCESS PROGRAMS PURSUANT TO DECISIONS 18-06-027 AND 21-12-036 REQUEST FOR EXPEDITED SCHEDULE – RULE 2.9**. This is a new application. No service list has been established. Accordingly, SDG&E is serving this application, testimony, and related exhibits by electronic mail to each party of record in A.12-01-008, *et al.* and R.14-07-002, *et al.*

Due to the ongoing Coronavirus (COVID-19) health crisis, our legal staff is working from home. Accordingly, pursuant to CPUC COVID-19 Temporary Filing and Service Protocol for Formal Proceedings, paper copies of e-filed documents will not be mailed to the Administrative Law Judge or to parties on the service lists.

Dated at San Diego, California, this 31<sup>st</sup> day of May 2022.

/s/ Darleen Evans  
Darleen Evans